

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK
WHITE PLAINS DIVISION**

In re:	:	
	:	Chapter 11
SEARS HOLDINGS CORPORATION, <i>et al.</i> ,	:	
	:	Case No. 18-23538(RDD)
Debtors.	:	
	:	(Jointly Administered)
	:	

NOTICE OF ENTRY OF APPEARANCE AND DEMAND FOR SERVICE OF PAPERS

Please take notice that Benesch, Friedlander, Coplan & Aronoff LLP hereby appears in the above-captioned case and enters its appearance as counsel for PREP Hanover Real Estate LLC (“Landlord”) pursuant to Fed. R. Bankr. P. 9010(b).

Please take further notice that counsel hereby requests, pursuant to Fed. R. Bankr. P. 2002, 9007, 9010, 9013, 9014, and Section 342 of Title 11 of the United States Code, 11 U.S.C. § 101, *et seq.*, that copies of all notices and pleadings given or filed in this case be given and served upon the following:

Michael J. Barrie, Esquire
Kevin M. Capuzzi, Esquire
BENESCH, FRIEDLANDER, COPLAN & ARONOFF LLP
222 Delaware Avenue, Suite 801
Wilmington, Delaware 19801
Telephone: (302) 442-7010
Facsimile: (302) 442-7012
mbarrie@beneschlaw.com
kcapuzzi@beneschlaw.com

Please take further notice that the foregoing demand includes not only the notices and papers referred to in the Federal Rules of Bankruptcy Procedure specified above, but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading, request, order, reply, answer, schedule of assets and liabilities, statement of financial affairs, plan, or disclosure statement, whether formal or informal, written or oral, and whether

transmitted or conveyed by mail, delivery, telephone, facsimile, or otherwise filed or made with regard to the above-captioned case and all proceedings therein.

This Notice of Appearance and Demand for Notices and Papers shall not be deemed or construed to be a waiver of Landlord's rights: (i) to have final orders in noncore matters entered only after *de novo* review by a District Court Judge; (ii) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case; (iii) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (iv) any other rights, claims, actions, setoffs, or recoupments to which Landlord is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments Landlord reserves.

Dated: November 9, 2018

BENESCH, FRIEDLANDER, COPLAN &
ARONOFF LLP

By: /s/ Michael J. Barrie
Michael J. Barrie (No. 5057450)
39 Broadway, 25th Floor
New York, NY 10006
(302) 442-7010
mbarrie@beneschlaw.com

Counsel for PREP Hanover Real Estate LLC